



U.S. Department of Justice

*United States Attorney  
Eastern District of New York*  
271 Cadman Plaza East  
Brooklyn, New York 11201

November 14, 2024

**By ECF**

Honorable Marcia M. Henry  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Guan, et al. v. Mayorkas, et al.*, No. 19-cv-6570 (Chen, J.) (Henry, M.J.)

Dear Judge Henry:

This Office represents Defendants Alejandro Mayorkas, Secretary of the U.S. Department of Homeland Security (“DHS”) in his official capacity; Troy Miller, Acting Commissioner of U.S. Customs and Border Protection (“CBP”) in his official capacity; and Tae Johnson, Acting Director of U.S. Immigration and Customs Enforcement (“ICE”) in his official capacity (collectively, “Defendants”) in the above-referenced action. Defendants write on behalf of all parties pursuant to the Court’s Order dated October 28, 2024, requiring the parties to “file a joint status report providing a further update on the settlement discussions” by November 14, 2024. *See* ECF Order dated Oct. 28, 2024.

The parties respectfully inform the Court that the parties are continuing the settlement discussions referenced in their September 12, 2024 letter, *see* ECF No. 115, and have made further progress. The parties respectfully submit, however, that additional time is needed to determine if the parties can reach agreement on a few outstanding issues. As such, the parties respectfully request that the Court direct them to provide a further status update on the progress of settlement discussions by December 16, 2024.

The parties thank the Court for its consideration of this matter.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/ Philip R. DePaul  
PHILIP R. DePAUL  
Assistant United States Attorney  
(718) 254-7503  
philip.depaul@usdoj.gov

cc: All Counsel (by ECF)